



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Monterey Bay National Marine Sanctuary
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**Comments from the Monterey Bay National Marine Sanctuary
on the California Resources Agency
Draft Policy on Coastal Erosion Planning and Response**

May 31, 2001

My name is Brad Damitz; I am here tonight representing the Monterey Bay National Marine Sanctuary. The Sanctuary was designated in order to protect the unique marine ecosystems and habitats of the region through resource management, research, and education. Because it stretches along nearly 300 miles of the central California coastline and the Sanctuary's mandate includes protection of aesthetic and recreational qualities, including beach related activities, we recognize that coastal erosion is a major issue that demands our renewed attention. Furthermore, all coastal protection structures and sediment disposal and nourishment below the mean high tide line require a permit from the Sanctuary.

We support the Resources Agency's effort to develop stronger policy that utilizes a broad integrated approach. Existing policies are inadequate, tending to approve projects on a case-by-case basis and not sufficiently addressing cumulative impacts. We also realize that in order to find a realistic long-term solution to the problem, more coordination must occur among relevant agencies. In light of this, we would like to offer our assistance in working with the Resources Agency, the California Coastal Commission, and local governments, to further develop policy and protocols that address coastal erosion within the Sanctuary region. We support the recommendations provided by the document, including among other things, the emphasis on hazard avoidance and structure relocation, effective land use planning, and long-term ongoing scientific studies.

The Sanctuary would like to offer several recommendations regarding the Draft Policy on Coastal Erosion Planning and Response. The document places a heavy emphasis on beach nourishment and sediment transport techniques. However, increased sediment loading should not be viewed as a one-size-fits-all solution to coastal erosion. The wrong types of sediment in the wrong places can result in significant environmental impacts. This can be seen in the example of the introduction to the marine environment of sediment loads from coastal highway repair and



landslide activities. This activity, if allowed to occur in biologically sensitive locations, or during critical times of the year, can disturb seabird colonies and marine mammal haul-outs, damage intertidal habitat, and create sand scour that prevents settlement of larval organisms. Similarly, introduction of certain kinds of dredge materials, and sediment from agricultural runoff that is contaminated or of inappropriate grain size can have significant impacts on biological resources in the sanctuary and its watersheds. We recommend that the document clarify that sediment transport efforts within both watersheds and the marine environment, must be carefully planned and selected to avoid biological impacts.

We are also concerned about the lack of solid scientific information regarding coastal erosion and mitigation measures. In order to create robust policy, existing data on coastal erosion in California must be compiled, evaluated, and made available to relevant agencies in order to improve their policies and practices, and to identify gaps warranting further research. Gaps that we believe to exist include the following:

- We recognize that coastal armoring and beach nourishment projects are necessary in certain cases, however more scientific research must be conducted on the impacts that these projects have on the marine and coastal environment. In addition, research should be compiled and conducted at the regional level on the sources and sinks of sand as well as other physical processes involving sediment transport and erosion.
- Since even hard structures exhibit significant variability in their environmental impacts and effectiveness, more specific guidelines should be developed for which types of structure are the best alternatives for specific locations and habitat types.
- Sensitive habitats and local geophysical areas where coastal armoring is not appropriate must be identified, and cataloged.
- Existing standards for minimum setback requirements, and economic life of a structure should be re-evaluated, using current long-term scientific data.
- Alternatives to beach nourishment and construction of hard structures, such as use of natural vegetative buffers, should be researched and incorporated into the policy.

We thank the State Resources Agency for taking a leadership role in further improving and expanding erosion policies. This policy represents an important step in addressing the issue of coastal erosion. Again we would like to offer our assistance in developing a more detailed regional approach to this issue here on the central coast. Thank you for holding a hearing here in Santa Cruz, and for providing me with an opportunity to testify.